

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FCC MAIL ROOM

In the Matter of )  
 )  
The Development of Operational )  
Technical and Spectrum Requirements )  
For Meeting Federal, State and Local )  
Public Safety Agency Communication )  
Requirements Through the Year 2010 )  
 )  
Establishment of Rules and Requirements )  
For Priority Access Service )

WT Docket No. 96-86

COMMENTS  
of the  
BRAZOS COUNTY EMERGENCY COMMUNICATIONS DISTRICT

1. INTRODUCTION

The Brazos County Emergency Communications District hereby submits the following comments filed in response to the Commission's Second Notice of Proposed Rule Making in the above-captioned proceeding.

The Brazos County Emergency Communications District is a special purpose district providing 9-1-1 telephone service to all of Brazos County. The District also provides dispatch services to the City of Bryan and rural Brazos County. Total population in the County exceeds 130,000. Our comments parallel the comments of the NPSPAC, Region 49, Regional Review Committee.

II. INTEROPERABILITY

We agree with the Commission's proposal to dedicate clear spectrum for interoperability in the 746-806 MHz band. Existing interoperability channels in other frequency bands should be maintained, but limited to local use within the structure of a national interoperability plan, so that the interoperability efforts to date are not wasted.

We agree with the PSWAC ISC recommendations that analog modulation for voice interoperability should be the minimum common mode adopted immediately. In our experience, the simplest forms of communications remain the most reliable under adverse conditions.

In anticipation of inevitable migration to digital technology, however, we believe that a single digital standard for interoperability needs to be established as quickly as possible to make seamless nationwide interoperability possible. We sadly note that the cellular industry's success in providing near-nationwide service with the AMPS standard is now being forgotten and ignored with the implementation of multiple digital technologies (TDMA, CDMA, GSM, etc.). We should avoid repeating the scenario in public safety interoperability.

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We believe that it will be necessary for the Commission to mandate the inclusion of interoperability channels in all public safety radios to achieve seamless nationwide interoperability. We believe that interoperability capacity must be instantly available in all radios at an incident because the first need for assistance develops as soon as initial emergency responders become overwhelmed. We suggest that the Commission also urge the manufacture of "interoperability only" radios to enable interoperability participation by those entities not changing their radio systems.

Although most public safety agencies are adept at envisioning emergencies beyond their own response capabilities, the myriad levels of political and financial managers controlling budgets are not. All too often, only immediate needs and mandates get funded. We can only note how sad and ironic it is that an entity that believed they had sufficient voluntary opportunities for interoperability during the NPSPAC proceedings subsequently experienced a tragic fire in which the lack of interoperability was a significant factor.

We believe that a national interoperability planning process should develop specific mutual aid guidelines within which the regional plans can be made. These guidelines would outline an operational structure for planned communications escalation, perhaps similar in form to the ICS management model, which would be imposed at all levels. The guidelines would also include minimal allocations for each type of communication with preassignments for each ICS function (command, operations, logistics, etc.) and a pool of channels for physically sectorized operations (i.e., north side of fire, east side of fire, etc.).

We believe that day-to-day and task force interoperability should be planned and administered at the Regional level to allow flexibility for individual needs. We also note that mutual aid incidents do not always reduce the need for continuing day-to-day and task force interoperability. We discourage a blanket change of all interoperability channels to exclusive mutual aid use during emergencies.

We have learned in our own Region that infrastructure-dependent communications systems are at risk for failure, no matter how well designed and backed up. We also note that some of the highly-touted features of trunking, such as over-the-air regrouping and visitor unit identification, have rarely been used during actual emergencies due to time and logistical constraints. Therefore, we cannot support the exclusive use of trunking for interoperability.

However, we believe that trunking should be encouraged as a additional option in those areas where the population density makes it likely that maximum spectral efficiency will be needed in almost any emergency situation.

Also, like a single digital interoperability standard, we believe that a single trunking standard must also be adopted to ensure uniform interoperability.

### III. GENERAL SERVICE

We agree with the Commission that the regional approach has worked well for the NPSPAC 821 MHz band, and that the interest and necessary expertise for 746-806 MHz planning exists in the regional committees. However, the existence of six separate Regions in Texas had caused considerable work for some individuals with statewide responsibilities. We would prefer that planning for the 746-816 MHz spectrum be done as a single Region.

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We request that the Commission better define the authority of the regional planning committees and regional review committees, and that this authority include the power to review licensee compliance with the Regional Plans and refer for enforcement to the Commission. We also request that the Commission establish a funding mechanism to support the work of the regional committees.

We believe that the suggestion to require express concurrence for changes in a Regional Plan from all adjoining regions grants an unwarranted *de facto* veto power. While concurrence is desirable, differences will occur, and the current public notice/comment/order process works.

We favor the Commission-designed band plan with regional flexibility to "aggregate" and "disaggregate" general service channels (Approach 3, para. 17 of the Second Notice). This allows for reasonable equipment standardization, enables technical progress and allows for local flexibility.

Similarly, we believe that regions should also have the ability to determine minimum co-channel spacing between base stations. The extreme variations of terrain in this country, its real-world effects on radio wave propagation, and opportunities to realize unique spectrum efficiencies are best recognized locally.

Although 24 MHz of new spectrum is a windfall for public safety, the demand will, at some time (perhaps immediately, in some areas) exceed the supply. It would be foolish not to use proven, spectrally-efficient, and available technology to maximize this resource. Therefore, we recommend that the Commission continue, as with the 821 MHz NPSPAC band, to require trunking on large systems and to promote and encourage consolidation and formation of multi-jurisdictional trucked systems.

Respectfully Submitted,



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